

ADAM J. BREEDEN, ESQ.
Nevada Bar No. 008768
BREEDEN & ASSOCIATES, PLLC
7432 W. Sahara Ave., Suite 101
Las Vegas, Nevada 89117
Phone: (702) 819-7770
Fax: (702) 819-7771
Adam@Breedendandassociates.com
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAVANZ CROSBY and
ANDREANAI HALL, individuals,

Plaintiffs,

v.

CITY OF NORTH LAS VEGAS on relation
of the NORTH LAS VEGAS POLICE
DEPARTMENT, a political subdivision of the
State of Nevada; CLARK COUNTY on
relation of the NORTH LAS VEGAS
CONSTABLE'S OFFICE, a political
subdivision of the State of Nevada; MIKE
CARMODY, individually; DELGADO
LOPEZ, individually; MICHAEL
MORRISON, individually; JESENIA
MANGUAL, individually; THANH LEE,
individually; DOES I-V, inclusive,

Defendants.

CASE NO. 2:24-cv-00880

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
PLAINTIFF TO FILE OPPOSITION TO
DEFENDANTS' MOTIONS TO DISMISS
[ECF NO. 24]**

[FIRST REQUEST FOR EXTENSION]

Plaintiffs, LAVANZ CROSBY and ANDREANAI HALL, by and through their counsel,
Adam J. Breeden, Esq. of BREEDEN & ASSOCIATES, PLLC, Defendants CITY OF NORTH
LAS VEGAS, MICHAEL MORRISON and JESENIA MANGUAL, by and through their counsel
Christopher D. Craft, Esq., and Defendants CLARK COUNTY, DELGADO LOPEZ, and
MIKE CARDMOY, by and through their counsel Jonathan D. Blum, Esq. of WILEY
PETERSEN and hereby stipulate:

WHEREAS on August 16, 2024, Defendants Clark County, Delgado Lopez, and Mike
Carmody filed its "Motion to Dismiss Complaint by Defendants Clark County, Delgado Lopez, and

1 Mike Carmody” [ECF NO. 24].

2 WHEREAS on August 19, 2024, Defendants City of North Las Vegas, Michael Morrison
3 and Jesenia Mangual filed its “Joinder of Defendants City of North Las Vegas, Michael Morrison
4 and Jesenia Mangual to Motion to Dismiss to Motion to Dismiss Complaint by Defendants Clark
5 County, Delgado Lopez and Mike Carmody” [ECF NO. 26].

6 WHEREAS Plaintiffs have requested additional time to file their Opposition to the
7 pending Motions to Dismiss and Joinder thereto.

8 WHEREFORE,

9 **IT IS HEREBY STIPULATED** that Plaintiffs Lavanz Crosby and Andreanai Hall shall
10 have up to and including Friday, September 13, 2024 to file and serve their opposition to the
11 pending Motions to Dismiss and associated Joinder.

12 **IT IS SO STIPULATED AND AGREED.**

13 Dated this 30th day of August 2024.

Dated this 30th day of August, 2024.

14 **BREEDEN & ASSOCIATES, PLLC**

**CITY OF NORTH LAS VEGAS
OFFICE OF THE CITY ATTORNEY**

15 /s/ Adam J. Breeden

/s/ Christopher D. Craft

16 **ADAM J. BREEDEN, ESQ.**

CHRISTOPHER D. CRAFT, ESQ.

17 Nevada Bar No. 008768
18 7432 W. Sahara Ave., Suite 101
19 Las Vegas, Nevada 89117
20 Phone: (702) 819-7770
Fax: (702) 819-7771
Adam@Breedendassociates.com
Attorneys for Plaintiffs

Deputy City Attorney
Nevada Bar No. 7314
2250 Las Vegas Blvd. North, Suite 810
North Las Vegas, NV 89030
Attorney for City of North Las Vegas, Michael
Morrison, and Jesenia Mangual

21
22 Dated this 30th day of August 2024.

23 **WILEY PETERSEN**

24 /s/ Jonathan D. Blum

25 **JONATHAN D. BLUM ESQ.**

26 Nevada Bar No. 09515
27 10000 W. Charleston Blvd., Suite 230
28 Las Vegas, Nevada 89135
Attorney for Defendants Clark County,
Delgado Lopez, and Mike Carmody

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 3 of September 2024.